

Texas Brine Company, LLC 1301 Highway 70

Belle Rose, LA 70341

Phone: 985-369-6657 Fax: 985-369-7873



October 29, 2013

Commissioner James H. Welsh P.O. Box 94275 Baton Rouge, LA 70804

RE: In response to State of Louisiana Department of Natural Resources Office of Conservation's Second Amendment to Declaration of Emergency and Directive

Commissioner Welsh,

In response to the Second Amendment and Declaration of Emergency and Directive order issued by the Louisiana Department of Natural Resources (LDNR), Office of Conservation on September 25, 2012, Texas Brine Company, LLC (TPC) understands the seven items listed in the document.

In the above mentioned, TBC was specifically directed and ordered to perform certain tasks outlined in the above mentioned document. Below are the required responses, as directed.

- 1. TBC's counsel provided LDNR legal counsel with a response to Directives 1-3 on September 28, 2012.
- 2. TBC understands Directive 4, which is to provide all daily logs and field notes from all contractors conducting investigation into subsidence and natural gas bubbling. The Daily Action Summary and results for current information can be found in the Attachment section of this report.
- 3. TBC understands Directive 5, which directs TBC to immediately allow for split or share any sample taken on site related to Well 3A (Serial Number 974265), the cavern, other wells facilities or other site locations. The Daily Action Summary of today's collection can be found in Attachment section of this report.
- 4. TBC understands Directive 6, which directs TBC to immediately report the results (final and preliminary) of any tests, logs samples or data collection performed on Well 3A, the cavern, other wells, facilities or site locations that indicate a change in any previously known conditions related to the investigation of the subsidence or natural gas bubbling

- events, and continue to report any such results. The Daily Action Summary and the Results related to this Directive can be found in Attachment section of this report.
- 5. TBC understands the Directive 7, which states that TBC will provide a daily summary of all tests, or logs performed or samples taken from Well 3A and the cavern as well as any results of those tests or logs, including preliminary as of September 25, 2012 and going forward. The Daily Summary and Results related to this Directive can be found in Attachment section of this report.

Please note that the drilling rig used for the Observation Well 3A has been removed and the site is being rigged down and returned to pre-drilling condition. As such, daily drilling reports for this well have ceased. Plans are being made for longer term potential gas venting/flaring requirements and possible hydrocarbon material recover from Well 3A.

In addition, previous daily summary reports issued to LDNR have included significant duplicate information as there is a fair amount of overlap in the information requested in each of the Directives included in the September 25, 2012 order. All requested information associated with the Directives issued in the September 25, 2012 order are included in the Attachment section of this report.

TBC believes that the submittal of this report satisfies the requirements of the Declaration of Emergency and Directive issued on September 25, 2012. As directed this report is submitted by email to <u>conservationorder@la.gov</u>, ref. "Emergency Declaration-Texas Brine Company LLC-9/25/2012.

Bruce E. Martin

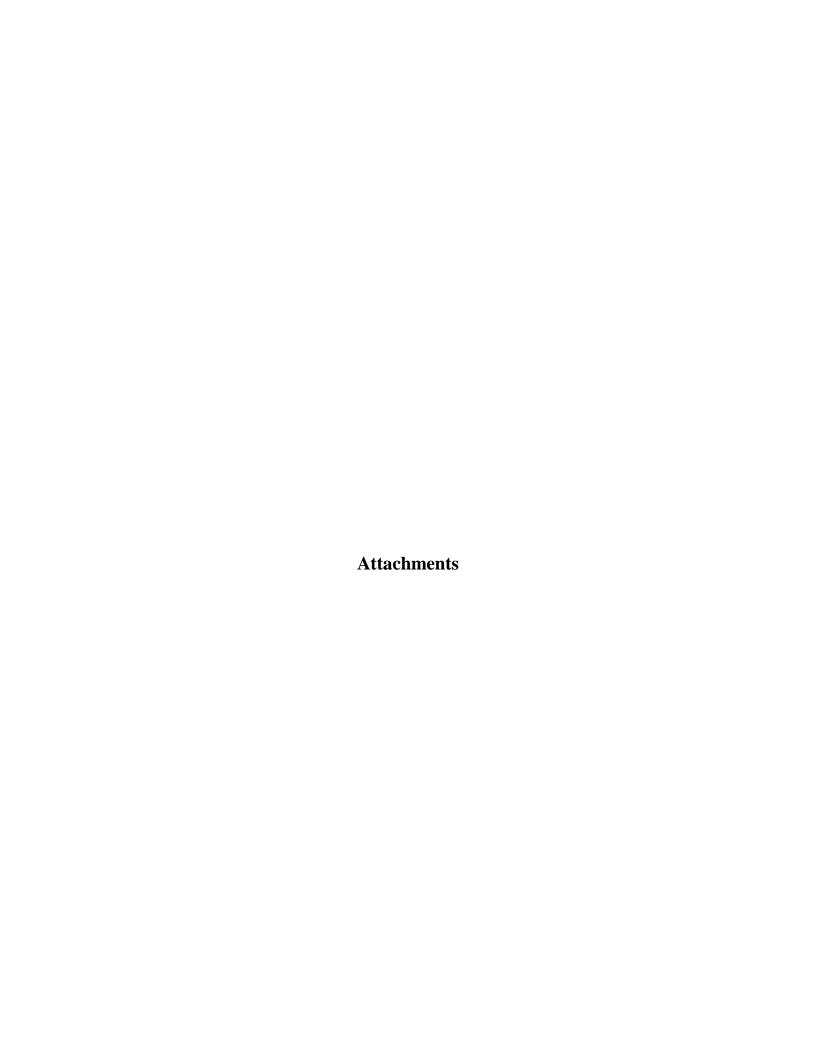
Vice President, Operations

Bana EMart

Texas Brine Company, LLC



			TBC Oxy Grai	nd Bayou Data Manager	ment-Enviro	nmental					
Contractor	Responsibilities	Coll	lected By	Date Collecte	ed	Delivered to Lab	Results from Lab	Laboratory	Method	Date to Ag	encies
Sage	Stationary Air Monitoring		Eric Rucinski - 07:55 - 08:55, Britt Barnett (Code Red) - 07:00 - 17:00		3	NA	NA	NA	NA	10/29/2	013
	Residential Air Monitoring	bimonthly resident Therefore, Sage	equested to suspend ential air monitoring. will discontinue these tivities.	nitoring.		NA	NA	NA	NA	NA	
_	Gas Seep Sampling	No wor	k performed	10/28/2013	3	NA	NA	NA	NA	NA	
	Well Gas Sampling	No wor	k performed	10/28/2013	3	NA	NA	NA	NA	NA	
	Under Slab Gas Sampling	No wor	k performed	10/28/2013	3	NA	NA	NA	NA	NA	
	Indoor Air Monitoring	No wor	k performed	10/28/2013	3	NA	NA	NA	NA	NA	
Respec			Meet with S. Borne &								
	Inclinometers/Tilt Meters/Transducers	10/28/2013	M. Taylor	N. Marncah; E. Krantz	NA	NA	NA		NA	NA	NA
_	InSAR Reflector Installations	10/28/2013	One Call Meeting	N. Marncah; E. Krantz	NA	NA	NA		NA	NA	NA
	Subsidence Survey-Fenstermaker	10/28/2013	No work Conducted	NA	NA	NA	NA		NA	NA	NA
	Shallow Geophone Installation	10/28/2013	No work Conducted	NA	NA	NA	NA	NA		NA	NA
	Deep Geophone Installation	10/28/2013	No work Conducted	NA	NA	NA	NA		NA	NA	NA
	Amendment #3, Directive #2	10/28/2013	No work Conducted	NA	NA	NA	NA		NA	NA	NA
	Expansion of geoprobe gas sampling locations	10/28/2013	No work Conducted	NA NA		NA	NA		NA	NA	NA
-	DPVE Pilot Test	10/28/2013	demob.	N. Marncah	NA	NA	NA		NA	NA NA	NA
	МІНРТ	10/28/2013	No work Conducted	NA	NA	NA	NA		NA	NA	NA
Miller	Weekly Stability Survey		k Performed	October 28, 20		NA	NA	NA	NA NA	NA	
_	Misc. Survey Work	_	. Sauce	October 28, 20		NA	NA	NA	NA NA	NA NA	
Pisani	Sinkhole Hydro/Perimeter Survey Surface Water	No Wor	k Performed NA	October 28, 20 October 28, 20		NA NA	NA NA	NA NA	NA NA	NA NA	
Pisani	Surrace water Sinkhole		NA NA	October 28, 20		NA NA	NA NA	NA NA	NA NA	NA NA	
-	Industrial Well Water	+	NA NA	October 28, 20		NA NA	NA NA	NA NA	NA NA	NA NA	
-	MRAA Well Water	+	NA NA	October 28, 20		NA NA	NA NA	NA NA	NA NA	NA NA	
-	GP/ORW Water	+	NA NA	October 28, 20		NA NA	NA NA	NA NA	NA NA	NA NA	
-	Cavern Water	1	NA	October 28, 20		NA NA	NA NA		NA	NA NA	
	Discharge/Outfall Water	1	NA	October 28, 20		NA	NA	NA NA		NA.	
	Geoprobe Wells		NA	October 28, 20		NA	NA	NA	NA	NA	
				Grand Bayou Well	3A						
	Daily Operations at 3A			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		Summary of	Today's events				
	• •						y 3A				
	10/29/2013	7am 0.23		10/29/2013	3						
						Relief	Well #1				
	10/29/2013					See ORW-01 F	lare Spreadsheet				



Daily Action Summary

October 28, 2013

Stationary Air Monitoring

- Eric Rucinski onsite from 07:55 to 08:55. Changed out the monitors between 08:10 and 08:40. Collected data from the monitoring database and forwarded to Steven Shaughnessy in the Baton Rouge office for processing.
- Britt Barnett of Code Red (monitor sub-contractor) onsite from 07:00 to 17:00. Assisted in battery change outs and maintenance of the monitoring equipment.

NOTE: A Code 3 was issued for the sink hole work area on 10/25/2013 and continues to remain in effect. Access to ORW-7a and ORW-8a is not allowed during times that a Code 3 is issued; thus, the monitors deployed at these locations on 10/24/2013 remain in place. No data has been collected for ORW-7a and ORW-8a since the battery life of the monitors expired on 10/25/2013. These monitors will be serviced and replaced as soon as the Code 3 is lifted.

Residential Air Monitoring

• Sage has been requested to suspend bimonthly residential air monitoring. Therefore, Sage will discontinue these activities. The last event was conducted on March 26, 2013.

Gas Seep Sampling

Not Scheduled

Well Gas Sampling

• Well gas samples collected from OG3A-1 on 10/25/2013 were delivered to the Accutest service center. Please see the attached COCs.

Under Slab Gas Sampling

Not Scheduled

Air Indoor Monitoring

Not Scheduled

*Time indicates start of time period (ex. 12:00:00 AM gives the time period 12:00:00 AM to 12:59:59 AM)

	Observation Relief	Well -7	Observation Relief Well - 8 Observation Relief Well - 11 South of OG3A-1							Onsite Trailers										
	ORW-7a		ORW-8a			ORW-11a				Pad #9					TR-1					
	Non- Methane		Non-				Non- Methane					Non-					Non- Methane			
D . T		TEL (0() 00 (0()	Methane	1120 () 1 171 (0()	02 (0/)	GO ()		1120 (T ET (0()	02 (0/)	502 ()	Methane	20 ()	I EI (0()	00 (0/)	GO ()		1120 (I EI (0()	02 (0/)
Date-Time *	CO (ppm) VOC (ppm) H2S (ppm)	LEL (%) O2 (%)	CO (ppm) VOC (ppm)	H2S (ppm) LEL (%)	O2 (%)	CO (ppm)	***	H2S (ppm)				VOC (ppm) H				41 /	VOC (ppm)	41 /		O2 (%)
10/28/2013 01:00:00 AM						0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 02:00:00 AM						0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 03:00:00 AM						0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 04:00:00 AM						0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 05:00:00 AM						0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 06:00:00 AM						0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 07:00:00 AM						0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 08:00:00 AM					<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9	
10/28/2013 09:00:00 AM					0.0	0.0	<1.0	0.0	20.7	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9	
10/28/2013 10:00:00 AM			No data collected - no access to monitors due to Code 3			0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9
10/28/2013 11:00:00 AM						0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 12:00:00 PM	No data collected - no access to n	nonitors due to Code 3				0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 01:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 02:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 03:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 04:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 05:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 06:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 07:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 08:00:00 PM						0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 09:00:00 PM						0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 10:00:00 PM						0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 11:00:00 PM						0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/29/2013 12:00:00 AM						0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9

Notes

A Code 3 was issued for the sink hole work area on 10/25/2013 and continues to remain in effect. Access to ORW-7a and ORW-8a is not allowed during times that a Code 3 is issued; thus, the monitors deployed at these locations on 10/24/2013 remain in place. No data has been collected for ORW-7a and ORW-8a since the battery life of the monitors expired on 10/25/2013. These monitors will be serviced and replaced as soon as the Code 3 is lifted.

*Time indicates start of time period (ex. 12:00:00 AM gives the time period 12:00:00 AM to 12:59:59 AM)

	Observation Relief Well -7			Observ	ation Relief V	Well - 8			Observation Relief Well -11 South of OG3A-1					Onsite Trailers									
		ORW-7a			ORW-8a				ORW-11a						Pad #9			TR-1					
	Non- Methane				Non- Methane					Non- Methane					Non- Methane					Non- Methane			
Date-Time *	CO (ppm) VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm) VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm) I	H2S (ppm)	LEL (%)	O2 (%)	SO2 (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)
10/28/2013 05:00:00 AM	·							•	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 06:00:00 AM									0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 07:00:00 AM									0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/28/2013 08:00:00 AM									<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9
10/28/2013 09:00:00 AM									0.0	0.0	<1.0	0.0	20.7	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9
10/28/2013 10:00:00 AM									0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9
10/28/2013 11:00:00 AM									0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 12:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 01:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 02:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 03:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 04:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 05:00:00 PM	No data collected - r	no access to mo	onitors due to	Code 3	No data collected - n	o access to m	onitors due to	o Code 3	0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 06:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 07:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 08:00:00 PM									0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 09:00:00 PM									0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/28/2013 10:00:00 PM									0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
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10/29/2013 01:00:00 AM									0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/29/2013 02:00:00 AM									0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
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10/29/2013 04:00:00 AM									0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9
10/29/2013 05:00:00 AM					I				0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9

Notes:

A Code 3 was issued for the sink hole work area on 10/25/2013 and continues to remain in effect. Access to ORW-7a and ORW-8a is not allowed during times that a Code 3 is issued; thus, the monitors deployed at these locations on 10/24/2013 remain in place. No data has been collected for ORW-7a and ORW-8a since the battery life of the monitors expired on 10/25/2013. These monitors will be serviced and replaced as soon as the Code 3 is lifted.

RESPEC Consulting & Services

Texas Brine, L.L.C.
Assumption Parish, Louisiana
Daily Field Report

Report By:	David Gnage	Date:	10/28/13
Company:	RESPEC	Job #:_	02241

Personnel	Company	Job Title
Nick Marnach	RESPEC	Staff Engineer
Eric Krantz, P.E.	RESPEC	Staff Engineer

Time Onsite:	Start Time:	7:30	End Time:	14:00

DAILY ACTIVITY:

Attended Daily Contractor meeting.

DPVE pilot program:

Begin data analysis.

Instrumentation Program:

Equipment procurement for brine tank expansion joint caliper measurements. Meet with Scott Borne and Mike Taylor concerning measurements. One call utility locate meeting. Clean and package transducers for shipment. Deliver transducers to Gonzales for shipment. Meet with Stella to view south berm crack.

PROPOSED SCHEDULE:

DPVE pilot program:

Assess future equipment requirements and view visit MK facility. Demobilize.

Instrumentation Program:

Demobilize.

Initials:	DJG	
ii iiliais.	DJG	

ME&A Daily Action Summary

October 28, 2013

Subsidence Survey:

No Work Done

Sinkhole Perimeter/Hydrographic Survey:

No Work Done

Support Sinkhole Cleanup

No Work Done

Misc. Survey Work

- Arrived @ 9:00 am
- Settlement plate survey for DPVE-47
- Rod survey of southern containment berm
- Settlement plate survey of plates 7 & 8
- Departed @ 6:30 am